

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

MAHMOUD RASHAD	)
	)
Plaintiff,	)
v.	) CIVIL ACTION FILE NO.
	) 1:14-CV-04108-AT-ECS
Fulton County, Georgia	)
	)
	)
Defendant.	)
	)

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**MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR**  
**PLAINTIFF MAHMOUD RASHAD**

COMES NOW Regina Molden, Janné McKamey, and The Molden Firm LLC (herein after “Counselors”) and pursuant to LC 83.1(E), NDGA, herby file this Motion to Withdraw as Counsel of Record for Plaintiff Mahmoud Rashad (“Rashad” or “Plaintiff”). Counselors have attached as Exhibit A, the Notice of Intent to File Motion to Withdraw as Counsel for Plaintiff which was served on Plaintiff on June 15, 2016 at this Plaintiff’s last known address, and in pertinent part states:

1. That Regina Molden wishes to withdraw;
2. That The Molden Law Firm LLC wishes to withdraw;
3. That the Court retains jurisdiction of the action;

4. The Clerk of the Northern District of Georgia, Atlanta Division, where your case is pending may be contacted through the following information:

Clerk James N. Hatten  
Richard B. Russell Federal Building and Courthouse  
75 Spring Street, SW  
2211 U.S. Courthouse  
Atlanta, GA 30303-3361  
(404) 215-1655

5. Counsel for Defendant may be contacted through the following information:

Office of the Fulton County Attorney  
Attn: Dominique Martinez  
141 Pryor Street, SW  
Suite 4038  
Atlanta, GA 30303  
(404) 612-0246  
[Dominique.Martinez@fultoncountyga.gov](mailto:Dominique.Martinez@fultoncountyga.gov)

6. That Plaintiff has the burden of keeping the Court informed respecting where notices, pleadings or other papers may be served;
7. That Plaintiff has the obligation to prepare for trial or hire other counsel to prepare for trial when the trial date has been set;
8. That if Plaintiff fails or refuses to meet these burdens, Plaintiff may suffer adverse consequences, including, in criminal cases, bond forfeiture and arrest;

9. That the dates of any scheduled proceedings, including trial, and that holding of such proceedings will not be affected by the withdrawal of Counsel;
10. That service of notices may be made upon Plaintiff at Plaintiff's last known addresses, as follows:

Mahmoud Rashad  
7190 Magnolia Lane  
Atlanta, GA 30213  
mmmrashad93@gmail.com

11. Plaintiff has 14 days from the date of this Notice to notify the Court or Counsel of any objection to Counsel's withdrawal that Plaintiff may have.

WHEREFORE Counselors respectfully request that this Court grant the foregoing Motion and Issue an Order permitting the withdrawal of Counselors from this action.

Respectfully submitted this 29th day of June, 2016.

s/ Janné Y. McKamey  
Regina S. Molden  
Georgia Bar No. 515454  
Janné Y. McKamey  
Georgia Bar No. 494137  
Peachtree Center – South Tower  
225 Peachtree Street, N.E.  
Suite 1245  
Atlanta, Georgia 30303  
Telephone: (404) 324-4500  
Facsimile: (404) 324-4501

Email: [rmolden@moldenlaw.com](mailto:rmolden@moldenlaw.com)  
[jmckamey@moldenlaw.com](mailto:jmckamey@moldenlaw.com)

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

LISA BARTELL,	)	
	)	
Plaintiff	)	
	)	
v.	)	CIVIL ACTION FILE
	)	NO. 1:15-CV-00196-ODE-LTW
FULTON COUNTY, GEORGIA	)	
	)	
Defendant	)	
	)	

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**CERTIFICATE OF SERVICE**

I hereby certify that that I have this day served the foregoing MOTION TO  
WITHDRAW AS COUNSEL FOR PLAINTFF upon Plaintiff and Defendant, via  
U.S. Mail and email, at their last known addresses:

Mahmoud Rashad  
7190 Magnolia Lane  
Atlanta, GA 30213  
[mmmrashad93@gmail.com](mailto:mmmrashad93@gmail.com)

Office of the Fulton County Attorney  
Attn: Dominique Martinez  
141 Pryor Street, SW  
Suite 4038  
Atlanta, GA 30303  
(404) 612-0246  
[Dominique.Martinez@fultoncountyga.gov](mailto:Dominique.Martinez@fultoncountyga.gov)

/s/ Janné Y. McKamey  
Janné Y. McKamey, Esq.  
Georgia Bar No. 494137

# EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

MAHMOUD RASHAD, )  
v. )  
Plaintiff, )  
v. )  
FULTON COUNTY, GEORGIA, )  
Defendant, )  
CIVIL ACTION FILE NO:  
1:14-cv-04108-AT-ECS

**NOTICE OF INTENT TO FILE MOTION TO WITHDRAW  
AS COUNSEL FOR PLAINTIFF**

In accordance with LR 83.1 (E), N.D. Ga., Regina Molden of the law firm The Molden Law Firm, LLC (hereinafter “Counsel”) hereby serves this notice of her intent to seek permission to withdraw her representation as Counsel of record for Mahmoud Rashad (hereinafter “Plaintiff”) in the above captioned matter. Please be advised of the following:

1. That Regina Molden wishes to withdraw;
2. That the Court retains jurisdiction of the action;

3. That Plaintiff has the burden of keeping the Court informed respecting where notices, pleadings or other papers may be served;
4. That Plaintiff has the obligation to prepare for trial or hire other counsel to prepare for trial when the trial date has been set;
5. That if Plaintiff fails or refuses to meet these burdens, Plaintiff may suffer adverse consequences, including, in criminal cases, bond forfeiture and arrest;
6. That the dates of any scheduled proceedings, including trial, and that holding of such proceedings will not be affected by the withdrawal of Counsel;
7. That service of notices may be made upon Plaintiff at Plaintiff's last known address, as follows:

7190 Magnolia Lane  
Atlanta, GA 30213

8. Plaintiff has 14 days from the date of this Notice to notify the Court or Counsel of any objection to Counsel's withdrawal that Plaintiff may have.

Respectfully submitted this 15th day of June, 2016.

**s/ Regina Molden-Clowney**

Regina S. Molden-Clowney  
Georgia Bar No. 515454  
Peachtree Center – Harris Tower  
233 Peachtree Street, NE Suite 1245  
Atlanta, Georgia 30303  
Telephone: (404) 324-4500  
Facsimile: (404)324-4501  
Email: [rmolden@moldenlaw.com](mailto:rmolden@moldenlaw.com)

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

MAHMOUD RASHAD, )  
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 Plaintiff, )  
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 v. ) CIVIL ACTION FILE NO:  
 ) 1:14-cv-04108-AT-ECS  
FULTON COUNTY, GEORGIA, )  
 )  
 )  
 Defendant, )  
 )

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing NOTICE OF INTENT TO FILE MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF upon Plaintiff, via U.S. Mail, at their last known address:

7190 Magnolia Lane  
Atlanta, GA 30213

/s/Regina Molden-Clowney  
Regina Molden-Clowney  
Georgia Bar No. 515454